

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CAROL STASZEWSKI,

Plaintiff,

v.

WELLESLEY COLLEGE,

Defendant.

Civil Action No. 05-10930 NMG

**JOINT STATEMENT SUBMITTED PURSUANT TO  
FED. R. CIV. P. 26(f) AND LOCAL RULE 16.1**

Pursuant to Fed. R. Civ. P. 26(f), Local Rule 16.1 and this Court's Notices dated November 14, 2005 and December 2, 2005, Plaintiff Carol Staszewski and Defendant Wellesley College submit this joint statement and proposed pre-trial schedule.

**I. Agenda for Scheduling Conference**

The parties propose that the agenda for the January 4, 2006 initial scheduling conference include discussion of the following:

- a. settlement status; and
- b. the parties proposed joint discovery plan.

As required under Fed. R. Civ. P. 26(f) and Local Rule 16.1(B), counsel conferred on December 6, 2005 to establish the proposed agenda and pre-trial schedule.

**II. Joint Discovery Plan**

**a. Initial Disclosures**

The parties agree to complete the disclosure of relevant documents and information required by Fed. R. Civ. P. 26(a)(1) on or before February 4, 2006.

**b. Fact Discovery Deadline**

The parties propose that all fact discovery, including depositions, be completed on or before September 30, 2006.

**c. Written Discovery Deadline**

The parties propose that written discovery requests to a party be served at any time after the scheduling conference, provided that the party serving such requests has first made the initial disclosures required by Local Rule 26.2(A).

**d. Depositions**

The parties propose that they may notice and take depositions at any time after the scheduling conference, provided that the party has first made initial disclosures required by Local Rule 26.2(A). The parties also propose that the parties be limited to a total of ten depositions per side in accordance with Local Rule 26.1(C).

**e. Expert Disclosure and Discovery**

The parties propose that Plaintiff must designate expert witnesses, if any, and produce expert reports on or before September 30, 2006, Defendant must designate expert witnesses, if any, and produce expert reports on or before October 30, 2006, and the depositions of expert witnesses must be completed on or before November 30, 2006.

**III. Filing of Motions**

The parties propose that all amendments to pleadings and joinder of additional parties must be filed on or before April 30, 2006.

The parties propose that any motions under Fed. R. Civ. P. 56 must be filed on or before January 16, 2007, and opposition papers to such motions must be filed on or before February 16, 2007. Reply memoranda, if any, must be filed on or before February 28, 2007.

**IV. Proposed Conferences with Court and Final Pre-Trial Conference**

The parties agree to the scheduling of a final pre-trial conference within thirty (30) days of receipt of a decision of any pending dispositive motions, if dispositive motions are filed. If no dispositive motions are filed, the parties propose that the final pre-trial conference be scheduled in January, 2007.

**V. Trial by Magistrate Judge**

The parties do not consent to trial by Magistrate Judge at this time.

**VI. Compliance with Local Rule 16(D)(3)**

Plaintiff's Local Rule 16.1(D)(3) certification will be filed prior to the scheduling conference. Defendants' Local Rule 16.1(D)(3) certification will be filed prior to the scheduling conference.

Respectfully submitted,

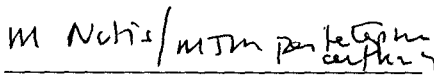
CAROL STASZEWSKI

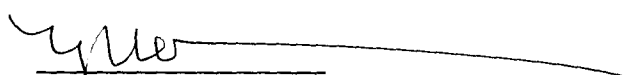
WELLESLEY COLLEGE

By her attorney,

By its attorneys,

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Dated: December 29, 2005